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March 1, 2018

Via Email at <u>Sibley.michael@epa.gov</u> and Express Delivery

RECEIVED

MAR 02 2018

Office of Environmental Cleanup

Mr. Michael Sibley, On-Scene Coordinator
Office of Environmental Cleanup
U.S. Environmental Protection Agency, Region 10
1200 Sixth Ave., Suite 900
Mail Stop: ECL-133
Seattle, WA 98101

Re:

Requests for Information Odessa Biodiesel Site:

Odessa Union Warehouse, Co-op Reardan Grain Growers, Inc.

Dear Mr. Sibley:

I am responding to the three letters of January 29, 2018 from Calvin Terada of EPA Region 10 in which he requests information regarding the above-referenced matter. His letters directed that our responses be sent to you. There are however some preliminary matters that require explanation.

You will recall that I had questions regarding who or what entity was intended as the responding party to these requests. The reason for that was due to several matters. First, the manner in which the envelopes were addressed. Second, the manner in with the letters were prepared with an inside address different from the envelopes. And, third the manner in which the "Respondent" was identified in the title page of the Information Requests and the way "Respondent" was defined in the Definition section of the Information Requests.

Without elaborating further, suffice it to say that at your suggestion, I spoke with attorney Kris Leefers about this. She clarified the intent as to my clients as follows: Odessa Union Warehouse Co-op is requested to respond to one of the Information Requests as "Respondent". On the second Information Request it was sent, Odessa Union Warehouse Co-op is requested to provide information regarding Inland Empire Oilseeds, LLC from the perspective of Odessa Union Warehouse Co-op. As to the third



Mr. Michael Sibley

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Information Request, Reardan Grain Growers, Inc. is requested to provide information regarding Inland Empire Oilseeds, LLC from the perspective of Reardan Grain Growers, Inc. Mr. Keith Bailey, an officer of Odessa Union Warehouse Co-op and Reardan Grain Growers, Inc. is neither a party from whom a response is expected individually nor is he a "Respondent".

With this clarification, we provide responses to the three Information Requests.

Very truly yours

JOHN R. ZEIMANT

JRZ:mms cc: Keith Bailey Enclosures